REMARKS

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Reconsideration of the application is respectfully requested.

I. Status of the Claims

Claims 3, 9 and 11 are withdrawn from consideration.

Claims 1, 2, 4, 6, 10, and 12 have been amended and the amendments do not add new matter.

Claims 1, 2, 6-8, 10, and 12-14 are pending.

Status of the Specification II.

Applicants have amended the Specification to correct typographical errors in accordance with the Examiner's helpful suggestion. No new matter has been added.

III. **Election of Species**

The Examiner states on page 2 of the Office Action dated November 26, 2004, that the Applicants elected the species of Figure 13 and the corresponding claims without traverse. Applicants respectfully disagree with the Examiner's characterization of Applicants' election.

Applicants stated that the election was with traverse. Specifically, in the response dated September 29, 2004, Applicants traversed the Examiner's finding that no claim is generic and submitted that claims 1 and 2 are generic. Further, Applicants traversed the election of a species if a generic claim is allowed. Applicants respectfully request the Examiner properly acknowledge the Applicants' election with traverse.

IV. Rejections under 35 U.S.C. § 112

Claims 2, 6 and 12 have been rejected under 35 U.S.C. § 112, second paragraph for indefiniteness. Applicants have amended claims 2, 6, and 12 according to the Examiner's helpful suggestions and respectfully submit that the claims are definite and request the rejection be withdrawn.

V. Rejections under 35 U.S.C. § 103

Claims 1, 2, 6-8, and 12-14 are rejected under 35 U.S.C. § 103(a) as unpatentable over Applicants' Admitted Prior Art (AAPA) in view of U.S. Patent No. 6,271,991 to Saliba et al. ("Saliba"). The Examiner contends that the AAPA discloses all of the elements except the teeth configuration and that Saliba discloses the teeth configuration. Applicants respectfully traverse the rejection.

Claims 1 and 2 have been amended to recite that the brake-locking member and the reel teeth portion are arranged coaxially. Figure 1 illustrates the center of both elements exploded along a common axis and the Specification describes this arrangement on page 13, line 19 to page 14, line 22.

In contrast, Saliba's brake 70 is disposed to one side of reel 18 and thus Saliba teaches a non-coaxial arrangement between brake 70 and reel teeth 60. Figures 4, 5 and 6 clearly illustrate that the elements are not coaxial. Further, Saliba, on column 5, line 52 to column 6, line 4, teaches and suggests that if the brake is disposed within a cartridge it has the non-coaxial arrangement

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illustrated in Figure 6. Thus, Saliba does not teach or suggest a coaxial arrangement. The engagement of teeth in a coaxial arrangement has different considerations than that of a non-coaxial arrangement and one of ordinary skill in the art is not taught or motivated to use Saliba's teeth in a coaxial arrangement of a break and reel teeth.

Further, regarding claims 1 and 2, both claims recite "a tip part ... a taper portion ... and vertical portions extending in a substantially vertical manner from the terminal of the taper portion to the base portion." Thus, the substantially vertical portions extend from the taper portion to the base.

In contrast, the vertical portions of Saliba's teeth do not extend to the base. The vertical portions of Saliba's teeth extend from the tapered portion to the tip and the tapered portion extends to the base. Figures 5 and 9 illustrate Saliba's teeth and both show the tapered portion extending to the base and vertical portion extending up from the tapered portion. Further, Saliba discloses that:

the profile 61 of the tooth 60 of the reel 18 and the complementary profile 63 of the tooth 60 of the brake 70 are shaped so that the braking force acts on the root 64 of the tooth 60 ... Because the root 64 of the tooth 60 of the reel 18 widens at the base, the force is distributed over a large cross-sectional area relative to a tooth that does not widen. ... A modified tooth, such as may be useful in the systems and methods described herein, is depicted in FIG. 9. This tooth widens at the base.

Saliba, column 6, lines 12-21 and 46-48. Thus, Saliba does not teach or suggest all the elements of claims 1 and 2. Claims 6-8 and 12-14 depend from claims 1 and 2 respectively and recite over the prior art of record based at least on their dependency to the independent claim. Thus, Applicants respectfully request that the rejection be withdrawn.

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CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner-s Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

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Respectfully submitted,

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